

LAW OFFICE OF
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April 29, 2021

VIA ECF

Hon. Debra C. Freeman, United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse

Re: *Rodriguez Alvarado et al v. 58 west llc et al*, 19 CV 7694 (AT)

Dear Judge Freeman:

This firm represents the plaintiffs in the above-referenced action. The parties jointly write to provide a status report and seek further time to resolve outstanding discovery issues.

The Court has ordered defendants to furnish plaintiffs with identifying information of certain potential witnesses identified in Plaintiff's Initial Disclosures. Defendants are in the process of researching their records, and the parties have agreed the Defendants will be providing identifying information related to these witnesses, to the extent it is in their possession, by May 20, 2021.

The parties have also conferred regarding additional requests for production of documents that plaintiffs served on defendants on February 12, 2021. After narrowing the requests, the parties have agreed that defendants will respond in writing and provide any supplemental documents in their possession by May 20, 2021.

Therefore, the parties ask the Court to allow the parties to submit a further status report by May 27, 2021, whereby the plaintiffs will either seek to move to compel responses to the February 12, 2021, document request, or the parties will certify that there are no outstanding discovery issues.

I thank the Court for its time and consideration.

Respectfully submitted,


John M. Gurrieri

Although the parties may have until 5/27/2021 to submit a further status report, that report should include either a confirmation that discovery is complete, or a joint proposal as to a date by which discovery should be considered closed.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge

Dated: 4/30/2021